



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

MEMORANDUM FOR: Hal Hicks
Associate Chief Counsel (International)

FROM: Matthew W. Frank, APA Program Director

DATE: April 22, 2004

SUBJECT: APA Quarterly Report for FY 2004,
Second Quarter Ending 3/31/04

The following are the APA Program's results for the second quarter of FY 2004 ("Q2").

APAs Completed

The APA Program completed 10 APA matters in Q2, consisting of 9 bilateral APAs and 1 unilateral APA.

Negotiating-Position Papers

The APA Program completed 3 bilateral negotiating position papers in Q2.

Annual Reports

The APA Program completed its review of and closed 25 annual reports in Q2.

New Matters

The APA Program received 7 new APA matters in Q2, including 4 bilateral and 3 unilateral APA matters.

APA Inventory

The APA Program has an ending inventory of 225 open matters.¹ This consists of 157 bilateral and 68 unilateral matters.²

Attached for your information is the APA issuance report and open inventory reports as of March 31, 2004. Please contact me at (202) 435-5222 if any additional information is required.

Respectfully submitted,

Matthew W. Frank
APA Program Director

Attachments

cc: LMSB Commissioner
Director, International
National Director of Appeals
LMSB Division Counsel

1. This equals beginning Q2 inventory of 228 matters, plus 7 receipts, less 10 closures { $228 + 7 - 10 = 225$ }.

2. The 225 open matters include 19 pending dollar filings (8 bilateral and 11 unilateral). Thus

- The APA Program has an inventory of 206 active cases, i.e., 225 open matters less 19 pending dollar filings.
- The 206 active cases consist of 149 bilateral cases (157 total bilateral matters less 8 pending bilateral dollar filings) and 57 unilateral cases (68 total unilateral matters less 11 pending unilateral dollar filings).
- The APA Program has forwarded 78 of the 149 active bilateral matters to Competent Authority. Thus, the APA Program has a current working inventory of 128 cases, consisting of 71 bilateral (149 active bilateral cases less 78 forwarded to Competent Authority) and 57 active unilateral cases.